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against an indebtedness to the bank. *Schlesinger v. Kurzrok*, 94 N. Y. Supp. 442.

Negotiable Instruments, Holder in Due Course, Va. Code 1904, Sec. 2841a (52).—A person who takes a note from another before maturity on an agreement to forbear suing on the debt for a few days at least, is a holder for value in due course. *Milius v. Kauffmann*, 93 N. Y. Supp. 667.

Negotiable Instruments, Holder in Due Course, Va. Code 1904, Sec. 2841a (52).—Where the holder of a check drawn on another bank deposited it to his own account, and the bank where it was so deposited credited the amount to the depositor's account, and the depositor's account remained sufficient to pay the check in case of dishonor, the bank was not a holder of the check in due course of business within the meaning of this section so as to exclude defenses which the drawer of the check might have against the payee. *Citizens State Bank v. Cowles*, 73 N. E. (N. Y.) 33.

Schools—Powers of Board of School Directors.—The right of a board of school directors, under a statute authorizing it to adopt rules and regulations for the well-being of the school, to debar members of high-school fraternities organized against its will, although with the consent of parents of the pupils, and meeting out of school hours, from participating in certain privileges attendant on membership in the school, such as connection with athletic teams, and with musical, literary, and military societies, and to deprive them of customary graduation honors, is sustained in *Wayland v. Board of School Directors* (Wash.) 7 L.R.A.(N.S.) 352.

MISCELLANY.

Railroad Accidents.—The total number of people killed by railroads in this country last year was nearly 11,000 and the number injured was a few less than 90,000. This summary of railroad casualties to life and limb includes passengers, employees and those run over or otherwise injured.

The proportion of passengers has not been published, but judging from the number already killed and injured during the first two months of 1907 one may well indorse Mr. James J. Hill's reported assertion that he has no feeling of security whenever he starts upon any railroad journey. In January and February of this year 306 passengers killed, and over 600 injured is the gruesome two month's total.

That the accident insurance companies are not finding their exist-